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July 6, 2007

Kim Muratore, Case Developer (SFD-7-5) U. S. EPA, Region 9 75 Hawthorne Street San Francisco, CA 94105

Re:

Supplemental 104(e) for the San Fernando Valley/North Hollywood

Superfund Site, North Hollywood, California

Dear Ms. Muratore:

On behalf of the Los Angeles By-Products Co., we are in receipt of your supplemental request for information dated June 4, 2007. In reviewing the request for information concerning third party defendants, each of the requests is overbroad, ambiguous, seeks opinion, legal conclusions, and requests information that may be protected by the attorney work product privilege and/or the attorney client privilege.

In response to the EPA's requests, Los Angeles By-Products Co. named various third party defendants in the good faith belief that the EPA did not identify all of the potential responsible parties in the San Fernando Valley/North Hollywood Superfund Site and erroneously sued Los Angeles By-Products Co. Los Angeles By-Products Co. refers the EPA to the pleadings and formal discovery in the civil action entitled <u>United States of America v. Allied-Signal, Inc. et al.</u>, United States District Court, Central District of California, Civ. No. 93-6570-MRP(Tx), which documents are in the possession of the EPA.

Very truly yours,
Raw M. Mortes

Raul M. Montes

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